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*The Idaho Commission for Libraries assists libraries to build the capacity to better serve their clientele.*

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21 April 2014

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

**Re: Modernizing the E-rate Program for Schools and Libraries, WC Docket No. 13-184**

The Idaho Commission for Libraries (ICfL) appreciates the opportunity to submit comments on this public notice. **ICfL strongly supports FCC's efforts to modernize the E-rate program, and supports the comments of the American Library Association on Modernizing the E-rate Program for schools and libraries.**

Idaho's population is 1,596,000 spread over 83, 570 square miles (19 people per square mile) with numerous mountain ranges and high percentages of state- and federally-owned land. Idaho has 103 public library jurisdictions with 143 facilities; 60 jurisdictions serve populations of less than 5,000. Because of the sparse population and geographic barriers, residential broadband deployment is below the national average. In addition, 70% of our public libraries report that they are the only source of free Internet access and computer use in their communities. Sufficient and affordable broadband in the public libraries is critical to help sustain Idaho's rural communities.

**The statutory purpose of ICfL is to help build the capacity of Idaho's libraries to better serve their clientele.** While there is no direct state aid to public libraries, ICfL's state appropriation funds consulting assistance, continuing library education, a variety of statewide library programs, and a growing collection of online resources (ranging from early literacy, K-12 support and college preparation, workforce skills development and job search tools, to business resources) for use by Idaho residents and visitors.

ICfL was awarded a BTOP public computer center grant in 2010 to significantly increase the broadband and computing capacity in 55 of our least connected library facilities. The grant also increased the online resources available to support workforce development and education, and provided information to the public about online resources available through public libraries.

As a result of the project, the average connectivity of the 55 libraries increased from just over 1 Mbps to just under 11 Mbps. In some cases, higher capacity was not available to the library, and in others the library could not afford more.

Prior to FY2011, Idaho public library participation in the E-rate program was modest. As a result of the BTOP project, FY11 E-rate disbursements of \$552,212 (including some Priority 2 requests from BTOP libraries) exceeded the total of the preceding 4 years. In 2012-2013, 96 of 143 outlets applied for and

received funding commitments of \$523,254; 56 of the 96 outlets are at the 80% discount rate. Funding requests for 2014-2015 total \$582,820.

While significant progress was made through the BTOP grant, most libraries face challenges of availability and affordability in meeting demand for broadband. Because of the sparse population and geographic barriers, competition among vendors – and therefore affordable service - is lacking in many parts of the state, as is scalable broadband. According to the 2012 Public Library Funding & Technology Access Study, only 7.3% of Idaho libraries have a maximum Internet connection speed of greater than 30Mbps, compared to the national average of 22.3%.

For the reasons stated above, ICfL supports the comments of the American Library Association submitted to the FCC on April 7, 2014:

- **A considerable portion of the funds should be designate toward demonstration projects** that test approaches and provide evidence to inform any future program changes to better meet connectivity needs of libraries and schools.
  - Specifically, ICfL strongly supports ALA's proposal to advance cost-efficient library network development via technical support enabled by state library agencies. Few Idaho libraries have dedicated IT staff, and too many rely on their vendor for advice and guidance. ICfL-coordinated technical support would help them better assess, on an ongoing basis, their own needs, evaluate their service and equipment options, and strengthen their ability to negotiate solutions.
- **A temporary infusion of considerable funds targeted toward bringing affordable and scalable high-capacity broadband to libraries** and schools where it is currently unavailable or where it may be available but program barriers inhibit libraries from taking advantage of it.
- **A portion of the funds should be used to increase access to what has traditionally been designate as "Priority Two" funding** so all applicants have equitable and reliable access to services necessary to bring the broadband from the door to the device.
  - With an average discount rate of 80%, very few Idaho libraries have received Priority Two funding since the program's inception.
- The future focus of the E-rate program should be on broadband services, but **support for voice services should be slowly phased out.**
  - In 2013-2014, 97 out of the 100 Idaho outlets that applied for E-rate applied for POTS for a total of approximately \$122,000. Ten of those applied only for POTS. Voice over IP is not a viable option yet in many parts of the state. ICfL strongly opposes eliminating support for voice services in 2015 or 2016.

Finally, ICfL supports ALA's additional recommendations to improve library participation in the E-rate program as described in its April 7, 2014 comments:

- Using the Institute of Museum and Library Services' (IMLS) version of the geo-coding created by NCES for determining library rurality.
- Revising the method for determining library discounts that more accurately reflects the demographics of a library's patrons.
- Enforcing the Lowest Corresponding Price rule.

- Removing the E-rate technology plan requirement for Priority 2 services and move development of technology plans to the state and/or local level.
- Simplifying the E-rate application process by replacing E-rate program procurement rules with those of the applicable state or locality, or set a \$5,000 *de minimus* funding request for exemption; allowing applicants to receive their E-rate funds directly from USAC; and eliminating the Form 470 and allowing applicants to file an evergreen Form 471 for multi-year contracts.

The Idaho Commission for Libraries supports the FCC's efforts to modernize the E-rate program by increasing its efficiency and extending its reach. Such improvements will help Idaho libraries meet the growing 21<sup>st</sup> century technology needs of the communities they serve.

Sincerely,



Ann Joslin  
Idaho State Librarian